

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KAREN NOVICK,

Plaintiff,

-against-

METROPOLITAN LIFE INSURANCE COMPANY
and METLIFE OPTIONS AND CHOICES PLAN
NO. 512,

Defendants.
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Civ. Act. No. 09-civ-6865 (RJH)

**DECLARATION OF
MATTHEW HALLFORD**

DOCUMENT
ELECTRONICALLY FILED

Matthew Hallford, pursuant to 28 U.S.C. §1746(2), declares under penalty of perjury the following:

1. I am a Litigation Specialist at Metropolitan Life Insurance Company (“MetLife”). As part of my responsibilities for MetLife, I am familiar with its procedures for processing and administering claims for disability benefits under employee benefits plans, including the MetLife Options and Choices Plan No. 512 (the “Plan”) that provides short-term disability (“STD”) and long-term disability (“LTD”) coverage to eligible participants and including specifically plaintiff Karen Novick’s (“Novick”) claims at issue herein. I am personally familiar with the manner in which MetLife maintains files and records, including those that relate to claims for benefits under the Plan.

2. This Declaration is respectfully submitted in support of the Defendants’ motion for summary judgment.

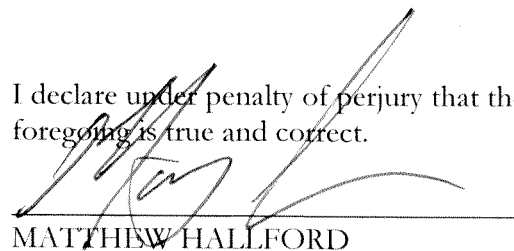
3. A true and correct copy of the Summary Plan Description for the Plan, which includes an accurate summary of the terms and conditions of the STD and LTD Plans, is annexed hereto as **Exhibit "A"** bearing Bates Stamp numbers NOVICK 000001 through NOVICK 000088.

4. Annexed hereto as **Exhibit "B"** are true and correct copies of the documents contained in MetLife's administrative claim file pertaining to Novick's claim for STD benefits under the Plan, which is maintained by MetLife in the normal and ordinary course of business, bearing Bates Stamped NOVICK 000089 through NOVICK 000918.

5. Annexed hereto as **Exhibit "C"** are true and correct copies of Novick's application for benefits under the LTD Plan, bearing Bates Stamped NOVICK 000925 through NOVICK 001112. When MetLife received Novick's application for LTD benefits, the application was inadvertently scanned to an existing claim under the Family Medical Leave Act.

Dated: December 19th, 2011

I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read 'Matthew Hallford', is written over a horizontal line.

MATTHEW HALLFORD

CERTIFICATE OF SERVICE

I, BETSY D. BAYDALA, hereby certify and affirm that a true and correct copy of the attached **DECLARATION OF MATTHEW HALLFORD** was served **via ECF and regular mail** on this 23rd day of December, 2011, upon the following:

Alan H. Casper Esq. 1845 Walnut Street, Suite 1500 Philadelphia, PA 19107 Business Phone: (215) 546-1124 Business E-mail: acasper@alanhcaspersq.com	Scott M. Riemer Esq. Riemer & Associates 60 East 42nd Street, Suite 1750 New York, NY 10165 Business Phone: (212) 297-0700 Business E-mail: sriemer@riemerlawfirm.com
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Dated: New York, New York
December 23, 2011

s/
BETSY D. BAYDALA (BB 5165)